

LAWRENCE & LAWRENCE LAW, PLLC
Nathan E. Lawrence, NBN 15060
Joseph P. Lawrence, NBN 16726
9480 S. Eastern Ave., Ste. 213
Las Vegas, Nevada 89123
Telephone: 702-534-6556
Facsimile: 702-602-5168
nathan@law2esq.com
joseph@law2esq.com
Attorneys for Plaintiff Hannah Hale Hoekstra

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HANNAH HALE HOEKSTRA, an individual,

Plaintiff,

v.

PERSHING COUNTY (Nevada) SHERIFF'S
OFFICE; DONNA ROBINSON, an individual;
DEPUTY BOYER, an individual; and P.
ZOHOVETZ, an individual; collectively,

Defendants.

Case No.: 3:24-cv-00392-MMD-CSD

**JOINT CONFERENCE REPORT
UNDER RULE 26(f) AND STIPULATED
DISCOVERY PLAN AND
SCHEDULING ORDER**

**SPECIAL SCHEDULING REVIEW
REQUESTED**

Pursuant to the Court's December 6, 2024, Order Setting Case Management Conference [ECF No. 20] and Fed. R. Civ. P. 26(f), Plaintiff HANNAH HALE HOEKSTRA ("Plaintiff" or "Ms. Hoekstra"), by and through her attorneys of the law firm of LAWRENCE & LAWRENCE LAW, PLLC, and Defendants PERSHING COUNTY, DONNA ROBINSON, and DANIEL E. BOYER (collectively, the "Pershing County Defendants"), by and through their attorneys of the law firm of THORNDAL ARMSTRONG, PC, and Defendant RANGER PAUL ZOHOVETZ (the "Federal Defendant"), by and through the UNITED STATES ATTORNEY'S OFFICE, hereby submit this Joint Conference Report and Stipulated Discovery Plan and Scheduling Order.

The instant matter was initiated by the Complaint filed on August 31, 2024 [ECF No. 1], as later amended on September 30, 2024 [ECF No. 6]. Following various stipulated extensions, the Pershing County Defendants filed their Answer [ECF No. 17] and Jury Demand [ECF No. 19] on November 27, 2024. The Federal Defendant filed his Motion to Dismiss or, in the Alternative, Motion for Partial Summary Judgment [the “Motion;” ECF Nos. 23, 24] on December 16, 2024, Plaintiff’s reply(ies) to which are due on January 20, 2025, per Stipulation [ECF No. 26] and Order [ECF No. 27].

On January 3, 2025, pursuant to FRCP 26(f) and LR 26-1(a), counsel for all parties communicated regarding preservation of evidence and presentation of discovery and a proposed discovery plan. The parties have not identified any issues regarding timing or scheduling of discovery. With respect to electronically stored information (“ESI”), the parties anticipate the need for all relevant body worn camera (“BWC”) footage of law enforcement personnel, emails, and items such as text messages, phone calls, and voicemail messages. The parties will move for or stipulate to a protective order in this matter regarding the BWC footage, specifically related to the identity of unrelated third parties and, pursuant to NRS § 289.025(2), relating to the confidentiality of photographs of law enforcement officers. Counsel for the parties are presently negotiating the details of such protective order.

The parties agree that no changes should be made to the limitations on discovery imposed under the Federal Rules of Civil Procedure or by local rule. Subject to reasonable best estimates of time by respective counsel for disposition of the Federal Defendant’s pending Motion and filing of an answer by same (if required), counsel for the parties hereby submit the following Stipulated Discovery Plan and Scheduling Order:

1) Initial Disclosure Date, pursuant to Fed. R. Civ. P. Rule 26(a)(1)(C): **January 17, 2025**. This date is 14 days after the Fed. R. Civ. P. Rule 26(f) Conference.

2) Discovery Cut-Off Date: **September 30, 2025**. The discovery period is proposed to run for nine (9) months / two hundred seventy (270) days from the date the Parties conducted the Fed. R. Civ. P. Rule 26(f) Conference. The extended time for discovery, which exceeds the routine allowance of one hundred eighty (180) days under LR 26-2, is requested by all parties and

is warranted in this matter based on the following considerations: (1) There are three individually named Defendants, subject to increase during the course of discovery, each of which will need to be deposed, as well as a possible Fed. R. Civ. P. 30(b)(6) designee for Defendant Pershing County; (2) additional percipient witnesses are likely to be identified for which depositions may also be necessary; (3) Plaintiff presently resides in Santa Rosa, California, and the Federal Defendant presently works/resides in southern Arizona, which increases logistical difficulty for their respective depositions and may require additional time and travel by counsel; (4) Plaintiff's allegation of psychological trauma and injury will likely require retention of medical experts who may be required to conduct physical examinations of Plaintiff under Fed. R. Civ. P. 35 in Santa Rosa, California, which will also necessitate additional time and travel by the experts and counsel; and (5) multiple depositions may be required of such medical experts as well as treating physicians.

3) Deadline for Amending the Pleadings and Adding Parties: **July 2, 2025**. This deadline is 90 days before the discovery cut-off date.

4) Deadline to Disclose Experts: **August 1, 2025**. This deadline is 60 days before the discovery cut-off date.

5) Deadline for Rebuttal Experts: **September 1, 2025**. This deadline is 31 days after expert disclosure.

6) Deadline for Dispositive Motions: **October 30, 2025**. This deadline is 30 days after the discovery cut-off date.

7) Deadline for Joint Pretrial Order: **December 1, 2025**. This deadline is 32 days after the dispositive motion deadline. If any additional dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after the Court renders a decision on the dispositive motions or enters further Court order. The disclosures required by Fed. R. Civ. P. Rule 26(a)(3) and any objections to them must be included in the joint pretrial order.

8) With regard to alternative dispute resolution processes including mediation and arbitration, the parties do not believe arbitration, mediation, or early neutral evaluation to be appropriate at this time, and the Federal Defendant has no interest in settlement discussions in

1 this matter. Plaintiff is amenable to settlement and will address with the Pershing County
2 Defendants in due course as circumstances and discovery may warrant.

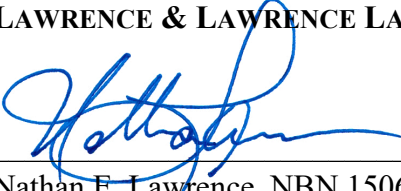
3 9) With regard to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R.
4 Civ. P. Rule 73 or the use of the Short Trial Program (General Order 2013-01), the parties have
5 discussed, but have not agreed, to trial by a magistrate judge or the use of the Short Trial Program.

6 10) Counsel for the parties certify that they are in agreement that evidence may be
7 presented in electronic format to jurors for the purposes of jury deliberations. The parties currently
8 have no stipulations regarding such evidence.

9 11) The parties agree that, with the exception of any Offer of Judgment by any party
10 under Fed. R. Civ. P. 60, service in this matter may be effected by electronic mail and/or the U.S.
11 District Court CM/ECF system.

12 **IT IS SO STIPULATED.**

13 **LAWRENCE & LAWRENCE LAW, PLLC**

14 
15 _____
16 Nathan E. Lawrence, NBN 15060
17 Joseph P. Lawrence, NBN 16726
18 9480 S. Eastern Ave., Ste. 213
19 Las Vegas, Nevada 89123
20 Telephone: 702-534-6556
21 Facsimile: 702-602-5168
22 nathan@law2esq.com
joseph@law2esq.com
Attorneys for Plaintiff

JASON FRIERSON, U.S. Attorney
District of Nevada, Nevada Bar No. 7709

13 /s/ R. Thomas Colonna
14 _____
15 R. THOMAS COLONNA
16 Assistant United States Attorney
17 501 Las Vegas Blvd. So., Suite 1100
18 Las Vegas, Nevada 89101
19 Telephone: 702-388-6336
20 Email: richard.colonna@usdoj.gov
21 *Attorneys for the United States*

THORNDAL ARMSTRONG, PC

23 /s/ Katherine F. Parks
24 _____
25 Katherine F. Parks, Esq., NBN 6227
26 6590 S. McCarran Blvd., Suite B
27 Reno, Nevada 89509
28 Telephone: 775-786-2882
kfp@thorndal.com
Attorneys for Pershing County Defendants

1 **IT IS SO ORDERED.**

2

3 DATED: January 15, 2025

4

5 

6 _____

7 UNITED STATES MAGISTRATE JUDGE

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

LAWRENCE & LAWRENCE
All brothers fight, but we fight for you.SM